

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**SOUND AROUND, INC., and DONGGUAN  
GOLDENHOT PLASTIC & HARDWARE  
PRODUCTS CO., LTD,**

**Plaintiffs,**

**v.**

**SHENZHEN KEENRAY INNOVATIONS  
LIMITED, WENG FENG PENG (a/k/a  
FENSON PENG), and U.S. Patent No.  
D952,810 S, in rem.**

**Defendants.**

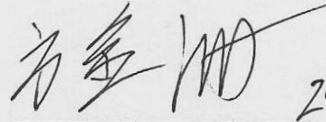
Civil Action No: 22-cv-06943-HG

I, Jinzhou Fang, declare and state as follows:

1. I am over 18 years of age and have knowledge of the facts set forth herein. I make this declaration based on my personal knowledge. If called as a witness, I could and would testify to the statements made herein.
2. I am the shareholder of Shenzhen Keenray Innovations Limited ("Keenray").
3. I, on behalf of Keenray, communicated with Dongguan Goldenhot Plastic & Hardware Products Co., LTD's ("Goldenhot") CEO, Xiuhua Zhao before August 2019. Goldenhot's employee Tang Afen sent me a Quotation for its products on August 1, 2019. The WeChat communication history was attached hereto as Exhibit 1.
4. I've been keeping in touch with Goldenhot because I've learned Goldenhot can manufacture towel warmers. At that time, Keenray aimed to design a more minimalistic and stylish design for a towel warmer.
5. The U.S. Patent No. D952,810 was designed by Keenray.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 7, 2023

 2023.11.7  
Jinzhou Fang